



Planning the Undocumented City:

Unauthorized Immigrants and Planners in the 21st Century

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Table of Contents

Introduction	1
Section 1. Literature Review	1
Section 2. Planners and Social Justice	6
Inclusion, Advocacy, and Social Justice: The Planner's Role	6
Overview of Local Interventions in Immigration Policy	7
Pragmatic Planning Implications of Unauthorized Immigration	9
Section 3. Evaluation of Atlanta-Area Plans	10
Methodology	10
Plan Evaluations	14
Basis of Inclusion for Criteria	14
Background of Plans Selected for Evaluation	22
Results	24
Discussion of Results by Criterion	25
Section 4. Recommendations	27
Conclusion	29
Works Cited	30
Appendix: All Plans Initially Considered For Inclusion	38

INTRODUCTION

A demographic hallmark of the 21st century has been the increasing dispersion of foreign-born populations from traditionally multicultural “gateway cities” like Los Angeles, New York, and Miami to a wide diversity of US communities, whether urban, suburban, or rural. Approximately one third of these foreign-born individuals are estimated to be unauthorized, or undocumented, immigrants. They represent not only an undeniable presence but also, in many communities, a key component of the local economy. Undocumented immigrants remain, however, an extremely vulnerable population; not only are the majority low-income, have low educational attainment, and frequently confront a significant language barrier, they also face additional challenges specifically related to their precarious legal situation.

Given the responsibility of planners to “seek social justice by working to expand choice and opportunity for all persons”, as mandated by the American Institute of Certified Planners’ Code of Ethics and Professional Conduct, what is our role in incorporating and addressing the needs of this controversial and vastly under-served population? How have planners conceived of this issue, and how have practitioners addressed or ignored undocumented immigrant communities in their actual, produced plans? The present report seeks to explore these questions.

Section 1 reviews pertinent literature from planning and related fields concerning undocumented immigrants. **Section 2** expands outward to look at inclusion, advocacy, social justice, and multiculturalism as principles in planning, and seeks to derive a mandate for why planners can and should incorporate the needs of undocumented communities into their work. The section also investigates some of the pragmatic aspects of planning for the undocumented, beyond those that are rights-based, and overviews the increasing trend of local intervention—both inclusive and exclusionary—in immigration policy. **Section 3** is an analysis of ten Atlanta-area planning documents, evaluating and discussing how they addressed (or did not address) the needs of undocumented immigrant communities. Through this more detailed look at planning processes in one specific metropolitan area, the questions raised at the beginning of the report will travel from the abstract to the concrete. **Section 4** offers recommendations to planners based on the findings of this report.

SECTION 1. LITERATURE REVIEW

Little coming directly out of the planning field has been written on the relationship between planners and undocumented immigrants. This gap is noteworthy because there is, nonetheless, a significant body of literature on marginalized populations, and even immigrant communities in general, in planning practice and theory. When immigrant issues are raised and written about, they are often discussed in a way that is applicable to immigrants regardless of legal status; this is a natural tendency, as despite the significance of status, it is

frequently “invisible” in everyday life. An undocumented person who risks driving without a license, works using a false social security number, and has a child with US citizenship may live in a way that is indistinguishable from an authorized immigrant of similar background. Documented and undocumented immigrants’ experiences are deeply intertwined: “the fate of undocumented immigrants, to a large degree, is dependent on established migrant communities.” (Burgers, 1998)

Yet while these conflation are often valid or, indeed, necessary, there is still much value in looking specifically at how undocumented individuals and communities interact with various planning and decision-making apparatuses. As the situation stands, many otherwise comprehensive studies, such as Turner and Murray’s (2001) looking at community diversity and spatial planning in South Florida, mention the significance of large local undocumented populations but then do not address the specificities at all. As will be explored widely throughout this paper, documentation status as a social and demographic category has significant implications for planners.

There is a well-established body of literature in urban economics and related fields concerning undocumented immigrants as part of the labor force. Additionally, planners such as Lee and Leigh (2007) have pointed to the difficulty of dealing with the data gaps left by undocumented individuals’ clandestine status. While this knowledge is important for the community design field to be aware of, it is not directly related to this review’s focus on planners in the public realm, as they interpret their own roles and responsibilities through a planning lens. This review centers around the sparse literature that does exist and speaks to this question, based on a systematic search of the journals *Environment and Planning*, *Environment and Urbanization*, *International Journal of Urban and Regional Research*, *Journal of the American Planning Association*, *Journal of Planning Education and Research*, *Journal of Planning History*, *Journal of Planning Literature*, *Journal of Transport and Land Use*, and *Landscape and Urban Planning*, as well as incorporation of a range of other sources. For an excellent historical overview of the American planning profession’s relationship with immigration and immigrants, see Domenic Vitiello (2009).

The role of the planner in the lives of undocumented people, or vice versa, is framed partly by the fact that while immigration policy has traditionally been set nationally, the effects reverberate most strongly on the local or municipal level, as a number of authors are noted. In their 2002 study of land-use conflicts involving immigrant communities in Santa Ana, California, Stacy Harwood and Dowell Myers initiate what appears to be one of the first conversations in the academic planning literature about the increasing local reorientation in immigration issues. This opened the door for scholars including Monica Varsanyi, who has, for a few years, written extensively on local interjections into the immigration policy realm. A 2008 article of hers, for example, analyzes how municipalities obliquely exercise power on immigrant issues, citing four different methods: 1) The creation of formal day labor centers to formalize the day labor process. 2) The enforcement of existing ordinances in such a way that has implications for the undocumented. 3) The adoption of new ordinances that

have implications for the undocumented. 4) Unofficial enforcement techniques, including various forms of harassment and intimidation. The first three of these are likely to involve planners in some capacity.

Varsanyi's 2011 piece builds similarly on her claim that the US is experiencing a "rescaling" of powers, and discusses comprehensive, radical pieces of legislation known as Illegal Immigration Relief Acts, passed by a number of cities starting with Hazleton, Pennsylvania. Within the discourse of these acts' proponents, the federal government has failed in its responsibility to guard the nation's borders, and is incurring costs at the municipal level in social services provided to unauthorized immigrants. Varsanyi considers the proliferation of these bills to be remarkable in that it represents a nativist contestation of the neoliberal policies that drive unauthorized migration, rather than the leftist contestations of neoliberalism more typically seen. Liette Gilbert (2009) similarly studies Hazleton, describing a "re-bordering" process that moves the effective border from that of the nation to that of the local jurisdiction. She notes the disenfranchising power of the nativist movement over the lives of undocumented people: "Over the last year, (unauthorized) migrants and their families, particularly Latinos/as, have retreated from community and public life to avoid being detected and deported." (c.f. Loukaitou-Sideris, 1999) Interestingly, Gilbert mentions that Hazleton's Illegal Immigration Relief Act was later ruled by a higher court to be in violation of police power, which has interesting implications for planners as their mandate historically derives from that same source. Friedmann and Lehrer (1998) look to Frankfurt-am-Main in Germany as a case study. They, too, are keenly aware of the tension between the local and the national on immigration issues; they note that while most migration research is done on the national scale, the effects of human migration are most acute felt on the local level. They also directly invoke planning theory, claiming that "AMKA [a progressive local political party] presents us with a prime example in practice of Jürgen Habermas' theory of communicative action."

There has been interest within the planning literature in Proposition 187, a piece of Californian legislature spearheaded by a nativist group called Save Our State. The 1994 ballot initiative was approved by voters, and would deny undocumented immigrants from using social services including health care and public education. Smith and Tarallo (1995), writing about the initiative, attempt to dispel the common misconception that undocumented immigrants come to the US to live off its social services. In fact, they point out, aside from California, other states that followed with restrictive initiatives, like Arizona and Texas, have comparatively poor provision of services. Armbruster *et al.* (1995) also analyze the circumstances surrounding the adoption of Proposition 187. Interestingly, they find the proposition to be part of a neoliberal dismantling of the state—opposite to Varsanyi's theory that these initiatives are a *contestation* of neoliberal realities. The authors seek to engage Proposition 187 in a radical critique, rather than a more simple liberal one. Pijpers and Van Der Velde (2007), interestingly, document a situation opposite yet parallel to that described by Varsanyi: instances in Poland and Germany where intervention at the local level allows for a more immigrant-inclusive environment than the federal government outlines. Similar to this are the municipalities in the US offering local identification for undocumented immigrants, or who accept the Mexican government's *matricula consular* as valid ID.

Some of the literature has focused on undocumented communities' ability to organize and win concessions in the face of significant odds. Most comprehensively, Stephanie Pincetl (1994) documents the exercising, in Los Angeles, of undocumented people's power in shaping community environments. She looks at case studies, including the formation of the Pico-Union Citizens' Collaborative, struggles to keep street vending legal, and the Justice for Janitors campaign. From these examples, she draws some insights on planners and undocumented communities. Pincetl highlights the importance of "culture as a resource" in empowering and organizing undocumented communities; for example, she cites prior scholars in suggesting that there is a unique "Chicano" or "Latino urbanism", based on the civic concept of the *citadin*, which cultivates a sense of public life as an integrated, non-compartmentalized whole lived in public. Within this sensibility, says, Pincetl, instead of a siloing of politics, "there is an acute sense of the political as part of daily life." Pincetl also raises the question of potentially allowing non-citizens to vote in local elections. She believes that the ability of outgroups to gain concessions in the first place as demonstrated in her case studies, inherently lends to the delegitimization of the state and the civic realm. In order to reconcile this apparent contradiction, Pincetl argues, society might best be served by extending de facto citizenship rights to all, basing determination geographically. This would serve not only to better opportunity for undocumented people, but also might enliven stultified local political scenes, she says. Morales (2010), like Pincetl, confirms the importance of social capital in undocumented people's daily lives in his study of Anthony, New Mexico's *Promotora* program. Cordero-Guzmán (2005) looks at the role of community-based organizations (CBOs) as a tool for undocumented immigrants, while Schaller and Modan (2005) examine business improvement districts (BIDs) and they challenges they can pose to immigrant organizing.

Indeed, a few studies have looked at the growing role nonprofit organizations play in the day-to-day political and civic life of immigrants. Hum (2010) analyzes their role, concluding that they are "key to materializing a political voice and the civic engagement of immigrants, including those who are undocumented." Kondo analogizes their role even further, specifically positing nonprofits as serving a role as advocacy or equity planner. This subsumption of the planning role into the nonprofit sphere may be a clue as to the reason for diminished dialogue in the planning field about undocumented immigrants.

Yet others see in immigration, including unauthorized immigration, a demographic redemption of sorts. Perhaps most prominently, planning scholar Dowell Myers, in his book *Immigrants and Boomers* (2007), argues the necessity of immigrant incorporation as a way to protect US society from social and economic collapse as the population becomes older and older. Fishman (2005) states that "[...]we are now at the beginning of a fifth migration that will reurbanize precisely those inner-city districts that were previously depopulated[...]. Immigration is at the heart of this 'turnaround.'" Huerta (2011), writing in the American Planning Association's *New Planner* magazine, offers planners recommendations on undocumented workforce development—one of the few articles to directly address the planning community on these issues.

In her thesis, Joanna Bernstein (2012) offers pragmatic recommendations, based on the needs of Lane County, Oregon, for planners working in a high-level capacity with potentially undocumented community members. These are:

- Make local governments more aware of the size and/or importance of the area's undocumented population.
- Build trust, and engage with good connections in undocumented communities.
- Develop more resources for Latinos who speak an indigenous Central American language (not Spanish) as their native tongue.
- Conduct a study on housing and rent discrimination towards Latinos, including undocumented immigrants.
- Start a meaningful dialogue about the creation of a municipal ID, which are issued in some immigrant-friendly cities to grant undocumented people a recognized form of identification.

Finally, on the most abstract level, a few planning scholars have offered their thoughts on the theoretical and ethical implications of unauthorized migration. Friedmann and Wolff (1982), in looking at the configuration of the future's world-class cities, asked "whose interests" would be served by this metropolises. They mention an immigrant underclass as one of the key elements of a world city, and clearly stake this topic as one important to the planning field: "Planners are directly engaged on this contested terrain." Ananya Roy, too, in her article outlining a vision for a "critical transnationalism," also affirms the centrality of planners in the immigrant struggle:

Many professions are defined by a singular purpose, such as the practice of medicine, or by a singular object, such as the law. No such singular purpose or object defines planning. Planning far exceeds any given object, be it the master plan or the zoning code.[...]Let me venture the argument that planning is one of those rare professions defined by ethics. It is a value-oriented profession, one concerned with the public interest but of course marked by the inherent paradoxes and ambivalences that are associated with the idea of the public interest.

Roy's approach, however, contrasts with that of Varsanyi and the other scholars who seek to localize the question of immigration. She is "interested in how critical transnationalism, by fostering new spatial imaginations of dwelling and crossing, can also enable new ethical principles. In particular, critical transnationalism **dislodges the city** [emphasis added] as the principal arena of planning thought and practice." Stacy Harwood criticizes planning practitioners as poor on equity and minority issues (2005), and also warns (2007) of the potentially co-optive power of institutional apparatuses such as Neighborhood Improvement Programs.

This review has summed up most of the relevant thoughts coming out of the planning literature that speak directly to questions of undocumented immigrants and their communities. Ultimately, while planning academics have looked widely at immigration in general—

and have occasionally touched upon undocumented populations on the theoretical level—there has been little to no substantive work examining any practical or concrete interplay between planning practice and undocumented residents qua undocumented.

SECTION 2. PLANNERS AND SOCIAL JUSTICE

INCLUSION, ADVOCACY, AND SOCIAL JUSTICE: THE PLANNER'S ROLE

The social scope of the planner's mandate is not necessarily self-evident. Different theories of planning have conceptualized a variety of roles for the planning practitioner—ranging from non-existent to all-encompassing—as a vector of transformative social change.

The planning field has long struggled with questions of distributive equity and the matter of who planners plan for. Planning emerged in the early 20th century in close association with Progressivism, a reform movement that considered itself to be a catalyst of social change, but has retrospectively been oft considered paternalistic (for example, see McGurty, 2003). This genesis led the way towards the dominance, in the middle half of the century, of the “rational planning model”, a technocratic-based understanding of planning that left decision-making solely to the technicians themselves and left little or no room for any public participation in those processes. This model, which led most famously and tragically to urban renewal, the systematic destruction of African-American and other “blighted” minority neighborhoods in order to make room for large projects such as freeways, was so enduring that even into the mid-1980s it could be written that “the underlying characteristics of rationality still pervade planning education and practice.” (Dalton, 1986)

As the 20th century began to wane, however, the rational planning model started to give way to other, more justice-oriented approaches to planning the built environment. Advocacy planning, for example, was one such paradigm, influentially proposed by Paul Davidoff (1965). In the context of this model, planners serve specific communities as advocates, much in the same way a lawyer might serve a specific client. While advocacy planning represented a significant leap forward in terms of recognizing the importance of equity and public engagement, it has, nonetheless, been criticized as unable to effect genuine social change within the existing system (Mazziotti, 1974).

Advocacy planning's heyday was ultimately rather short-lived, and today, justice-minded planners draw on a range of paradigms in order to effect positive change. Many of these derive from the work of German philosopher Jürgen Habermas, and unite under the auspices of “communicative” or “collaborative” planning, of which one particularly influential work is Forrester's *Planning in the Face of Power* (1989).

Whatever the specific ideology or orientation espoused, it is clear that as we enter the 21st century in full force, planning is a field renewed, with deepened connections to serving the historically under-served, making unjust situations more equitable, and ensuring public input into the projects that affect their lives.

In addition to looking to the evolution of planning, we can also derive a clear mandate for planning for the under-served from today's professional code for planners. In no ambiguous terms, the American Institute of Certified Planners' Code of Ethics and Professional Conduct states: "We shall seek social justice by working to expand choice and opportunity for all persons, recognizing a special responsibility to plan for the needs of the disadvantaged and to promote racial and economic integration. We shall urge the alteration of policies, institutions, and decisions that oppose such needs." Elsewhere: "Participation should be broad enough to include those who lack formal organization or influence." The clarity of these words should make it obvious that the needs of undocumented community members fall indisputably under the purview of today's planner.

OVERVIEW OF LOCAL INTERVENTIONS IN IMMIGRATION POLICY

Immigration policy in fact comprises two distinct pieces: immigration control policy and immigrant policy. While the former is what often comes to mind in political debate around the issue, the latter, immigrant policy, which concerns "the conditions provided to resident immigrants" (Meyers, 2000), is of significantly greater relevance to planners and other urban policy- and decision-makers. While immigration control policy is determined largely by the federal government, and to a smaller extent by border states and communities, municipalities, counties, and other local jurisdictions have agency in determining immigrant policy. According to Monica Varsanyi (2010), "approximately 1,500 laws and resolutions were considered in all 50 state legislatures, and 353 were ultimately reached."

The ability of local authorities to forge immigrant policy can, of course, be applied towards differing policy goals. Many municipalities have self-divided into two camps: those showing unusual lenience to undocumented residents or even tacitly attempting to attract them, and those attempting to pass exclusionary policies that threaten the rights of the undocumented. As documented by numerous scholars—perhaps most notably, Varsanyi—the US has, in recent years, seen an uptick in local-level conservative activism enacting policies that encroach on the rights of undocumented immigrants or otherwise render their lives more difficult. Cities enacting inclusionary laws and policies—sometimes referred to as "sanctuary cities"—are less common.

In some realms of public life, policy does not have to be officially enacted in order to affect the ability of undocumented immigrants to access service. In a number of cases, city agencies have made internal decisions at their own discretion. For example, as Varsanyi (2007) illustrates, over the course of the past decade or so, local agencies across the United States have begun accepting as a form of valid identification the *matrícula consular*, an identity card issued by the Mexican government to its citizens, of which a significant proportion of

unauthorized immigrants in the US are. Having an accepted form of identification opens up the door for undocumented individuals to a much wider array of services. Often, recognition of the *matrícula consular* means the undocumented can receive driver's licenses in those communities. While this has been controversial among those seeking to reduce the mobility and access to services of unauthorized immigrants, many policymakers increasingly argue that enabling the licensing of undocumented individuals who are already driving is a key safety measure (Guerrero, 2013; Poston, 2013). In 2013, the federal government declared a subset of undocumented immigrants, who entered the US as children, to be lawfully present under the Obama administration's "deferred action" plan, and at the time of this writing, a number of states are in the process of rolling out driver's licenses for these individuals, to varying amounts of public pushback.

Elsewhere, municipal actors have taken it upon themselves to interpret legal precedent widely in a way that excludes undocumented immigrants. A police department in New Hampshire (Belluck, 2005) and a vetoed bill in Arizona (Archibold, 2006) both interpreted the arrest of unauthorized immigrants by police (rather than ICE agents) as valid under the auspices of trespassing laws, because they were "trespassing" in the United States. In both of these cases, however, a higher authority determined that this interpretation "infringed upon the federal government's authority in matters pertaining to immigration" (Varsanyi, 2007). The resolution of immigration policy disputes has frequently been complicated by the tension between federal and local control on these matters.

As mentioned, however, the relocation of immigration and immigrant policy to the local sphere has been a two-way street. Not all of these local interventions have been exclusionary in nature; some jurisdictions, recognizing either an ethical imperative or economic common sense, have taken decisive action to welcome immigrants, including undocumented immigrants, to their communities. These localities have been described, at times both appreciatively and derisively, as "sanctuary cities"; one source (Villazor, 2010) defines these as "some municipalities that have adopted sanctuary, non-cooperation, or confidentiality policies for undocumented residents, which may be viewed as inclusionary types of laws." Such localities have been variously open or discreet about the pro-undocumented intent of these laws; for example, San Francisco in 1985 declared itself a "City of Refuge" in explicit defiance of federal treatment of Guatemalan and Salvadorian deportees (Villazor). On the other hand, cities working in political contexts more sensitive than that of the San Francisco Bay Area have often taken more covert approaches. These more passive policies often take the form of "Don't Ask Don't Tell" orientations towards individuals' legal status (Nyers, 2010).

Varsanyi succinctly defines these local policies and agency-based decisions as "'local citizenship policy' approaches, which document how subnational governments are formulating membership policy for their resident non-citizen population within the limits of and in tension with federal doctrinal contexts" (2007). This has significant implications for planners. Because planners most often work within the local context, the paradigm shift from immigration and immigrant policy locating itself on the highest decision-making levels to locating itself

on the local level, their input will take on increasing relevance in these realms. Thus, planners both need to be prepared to wrestle with questions of immigration that may not have been brought to their attention in decades prior.

PRAGMATIC PLANNING IMPLICATIONS OF UNAUTHORIZED IMMIGRATION

Ensuring that all voices are at the metaphorical table in the planning process is not simply an ethical or political concern (though it is, to be sure, a huge one), but also a pragmatic concern. While the rational planning model, wherein data and technical expertise were the sole relevant variables in planning processes, has been primarily placed firmly in the past, it is no less true today that planners rely on accurate and comprehensive data in order to make good decisions. While the social and communicative context in which planners *make* decisions has changed enormously, the ultimately fidelity of the data used to make these decisions is as crucial as ever.

Where good data are lacking, due diligence in addressing a community's needs becomes even more important. Undocumented immigrants represent a lacuna of sorts in the United States' demographic surveillance of its residents. Whatever challenges, biases, and gaps are present in the US Census and American Community Survey for the population at large are amplified when it comes to undocumented people, because these individuals often have significant stake in not being counted. "Neither the Census Bureau nor any other U.S. government agency counts the unauthorized migrant population or defines their demographic characteristics based on specific enumeration." (Passel, 2005) Additionally, their status when it comes to being officially counted is ambiguous: the Census does not seem to have adopted a clear binary stance on whether or not undocumented immigrants are to be considered. Thus, available data vary; for example, the 1980 Census captured 50 to 60% of undocumented Mexican immigrants, whereas in 1990 and 2000, Census undercount of this population was only about half as much (Orrenius and Zavodny, 2000).

Because so much of planning practice depends on analyzing conditions in the present to project future contexts, lacking a panoptic view of the present can lead to problems down the road. Making sure to work directly with populations who are not sufficiently accounted for in the Census can help qualitatively recoup some of this key information.

SECTION 3. EVALUATION OF ATLANTA-AREA PLANS

METHODOLOGY

In order to ascertain the level of recognition of undocumented individuals in the planning process, I sought to identify those planning documents that included the highest proportions of undocumented individuals within their study areas. The greater the number of undocumented immigrants within a community, the more ethically and pragmatically pressing their inclusion might be.

Consequently, I compiled a list of the major community plans undertaken in the Atlanta area within the past fifteen years. The Atlanta area was defined as the eighteen-county jurisdiction of the Atlanta Regional Commission (ARC), the regional MPO (Metropolitan Planning Organization). This includes the entirety of the counties of Cherokee, Clayton, Cobb, Coweta, DeKalb, Douglas, Fayette, Forsyth, Fulton, Gwinnett, Henry, Rockdale, and Paulding, as well as parts of Barrow, Newton, Spalding, and Walton counties and all municipalities located entirely or partially in the bounded region.

Planning documents collected for potential analysis were comprehensive community plans, whether in name or in effect. Plans focusing exclusively on one aspect of the urban environment, which were chiefly highly technical transportation plans, were excluded. Also excluded were plan updates unless they appeared to constitute a significant stand-alone work.

As a result, the plans collected are primarily of three types. The first are those funded by Livable Center Initiative (LCI) grants, awarded competitively to areas under the ARC's jurisdiction for plan completion and implementation. The second are those created under the auspices of Georgia Blueprints for Successful Communities, a technical assistance program that the Georgia Conservancy coordinates to assist communities with plans emphasizing quality development and sustainable growth. The third are those created under the mandate of the Georgia Department of Community Affairs (DCA), which requires municipalities, either independently or as part of their county, to maintain a comprehensive plan. The DCA also requires a community involvement process, and thus these plans often touch on engagement issues more explicitly than LCI or other Atlanta-area plans.

Once the list of planning documents was collected, I used the interactive online data interface Social Explorer to discover the percentage of foreign-born residents within the geographical boundaries of each planning study. These data are from the American Community Survey (ACS) of the US Census. For a few plans whose study boundaries were coterminous with a county or municipality, this figure is fully accurate, as I was able to use 2008-2010 Place data. For those plans with more complex, multi- or semi-jurisdictional boundaries, I used

2006-2010 Census Tract data. Because this necessarily includes a portion of residents beyond the intended boundaries, it is slightly less accurate. However, this is unlikely to introduce significant error into a ranking process that is inherently speculative as is.

The chosen proxy is necessarily imperfect, but undocumented immigrants typically live in areas with others from their home country (Zavodny, 1997), and families of mixed documentation status are common. This proxy is more likely to produce “false positives” than “false negatives.” It is more likely that an area with a large population of foreign-born residents might not contain many undocumented immigrants, especially if the legal foreign-born population in question is wealthy and/or highly educated, and less likely that an area with few officially-counted foreign-born residents might contain a large population of undocumented immigrants. In the end one plan became disqualified on the basis of qualitative knowledge that its high foreign-born population was unlikely to signify a similarly significant undocumented one.

The question of how to count the US’ undocumented immigrant population is a recurrent one that creates huge roadblocks for any planning researcher, whether specifically investigating undocumented communities or looking at the wider population. A number of institutional, legal, and social barriers exist preventing the accurate counting of undocumented individuals. Estimates exist for larger geographic scales, but are not available with the kind of local granularity present for US Census and ACS data.

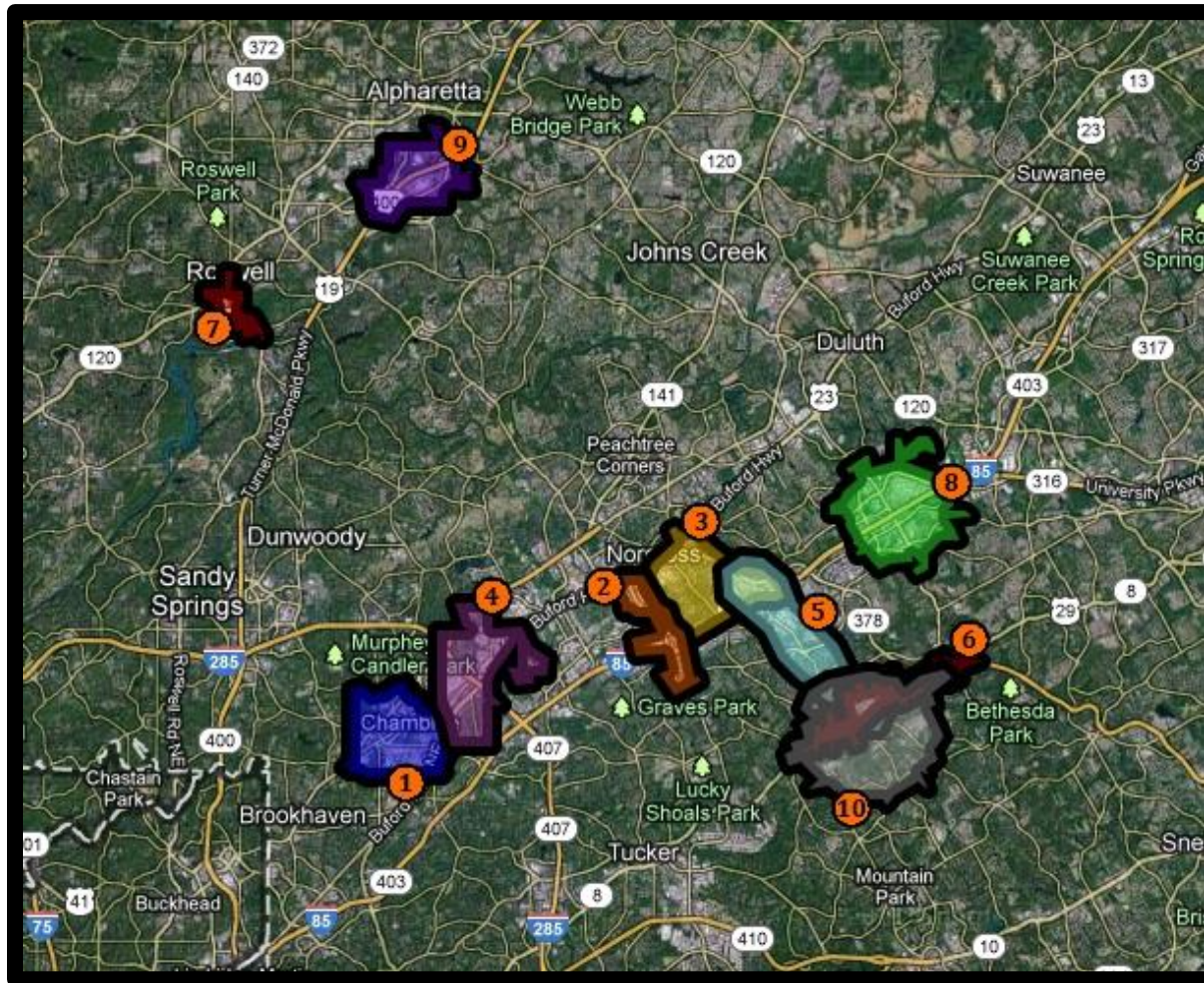
Hoefer, Rytina, and Baker (2012), estimating for the Department of Homeland Security (DHS) applied a series of adjustments to ACS and DHS data in order to triangulate a figure for number of unauthorized immigrants. They estimated that there were 11.5 total unauthorized individuals for the United States in 2011. For the state of Georgia, their estimate was 440,000 individuals—double the estimate from eleven years prior. Passel and Cohn (2012), on behalf of the Pew Research Hispanic Center, estimate a similar 2011 undocumented population of 11.1 million.

In all, I evaluated 204 comprehensive plans in the Atlanta area by their boundaries’ proportion of foreign-born residents in order to determine their inclusion in the ultimate analysis. Figure 1, following, shows those twenty plans encompassing the highest proportions, along with whether they were selected or not after duplicate locations (described shortly) and other disqualifying factors were taken into account.

Figure 1. 20 Atlanta-area plans with the highest proportions of foreign-born population.

Plan	% foreign-born	plan selected for analysis?
Chamblee Comprehensive Plan	57.3%	Y
Doraville LCI	54.7%	N
Jimmy Carter Blvd LCI	53.0%	Y
Norcross Activity Center LCI	52.5%	Y
Doraville GM LCI	49.1%	N
Doraville Comprehensive Plan	46.9%	Y
Norcross Comprehensive Plan	46.8%	N
Indian Trail Lilburn LCI	45.9%	Y
Highway 29/Lilburn LC	44.3%	Y
Lilburn LCI	43.9%	N
Clarkston Comprehensive Plan	40.2%	N
Roswell Historic Gateway Master Plan	36.3%	Y
Gwinnett Place Mall Pilot Study	33.8%	Y
North Point Alpharetta LCI	32.9%	Y
Hapeville Town Center LCI	32.8%	N
Hapeville VA Park LCI	32.8%	N
Duluth Comprehensive Plan	31.3%	N
Lilburn Comprehensive Plan	31.0%	Y
Duluth LCI	29.5%	N
Berkeley Lake Comprehensive Plan	29.2%	N

Figure 2. Map of study boundaries of selected planning documents.



1. **Chamblee Comprehensive Plan**
2. **Jimmy Carter Blvd. Corridor Study**
3. **Norcross Activity Center LCI**
4. **Doraville Comprehensive Plan**
5. **Indian Trail-Lilburn Road LCI Corridor Study**
6. **Highway 29 Corridor Study LCI**
7. **Roswell Historic Gateway Master Plan**
8. **Gwinnett Place Mall Pilot Study**
9. **North Point Activity Center LCI Study**
10. **Lilburn Comprehensive Plan**

The report ultimately analyzes ten plans, the study boundaries of which are illustrated above in Figure 2. While percentage of foreign-born residents was the most immediate criterion for inclusion, geographic diversity was also important: where multiple plans to be included would cover a similar study boundary, I applied qualitative judgment to choose whichever plan seemed to be the most

comprehensive in scope. The Clarkston Comprehensive Plan was eliminated from consideration because Clarkston has an unusually large population of state-sanctioned refugees, who are necessarily documented, and are not likely to serve as a proxy for the undocumented population in the same way other immigrant groups might.

PLAN EVALUATIONS

In sum, the next step, following the selection of appropriate planning documents, consisted of evaluation of these plans based on their success in the following analysis and engagement categories, which were selected based on their relevance to the specific needs of undocumented immigrant communities. Each category has been assigned a code for ease of identification later.

Plan analysis and recommendations

Recognition of immigrants and community diversity (PAR1)

Recognition of immigration status specifically (PAR2)

Discussion of plans for a day labor center or other facility specifically targeting the undocumented (PAR3)

Discussion of job development for low-skill workers (PAR4)

Recognition of need for affordable housing (PAR5)

Recognition of community policing and other progressive criminal justice initiatives (PAR6)

Support of small business entrepreneurship (PAR7)

Engagement process

Discussion of outreach to immigrant communities (EP1)

Discussion of outreach to undocumented immigrant communities specifically (EP2)

Awareness of location issues (EP3)

Treatment of language issues (EP4)

BASIS OF INCLUSION FOR CRITERIA

This section discusses each criterion for evaluation, and the reasons for having found each to be of significant interest to the specific needs of undocumented immigrants.

PAR1. Recognition of immigrants and community diversity, and specific outreach to immigrants in the engagement process

Any attempt to bring undocumented immigrants into the city planning first necessitates the basic ability to address the question of the immigrant community at large, as well as the adoption of an attitude that celebrates rather than problematizes human diversity. There is no question that attempting to understand and embrace diversity in the planning process introduces challenges, but the body of literature on multiculturalism and the city contends that these challenges are of key importance to engage.

It is important to place multiculturalism or diversity within its proper context. Practices or attitudes are not uniform internationally; Leonie Sandercock (2003) posits that the US approach to cultural recognition has been most similar to France, with its insistence on a “melting pot” in the dominant political culture. Australia and Canada, however, “have both, in the last 30 years, officially declared themselves as multicultural societies, and have made corresponding shifts in public policies to adapt to that new political ideology.” Sandercock notes, nonetheless, that even these two countries have adapted and reacted to pressures in significantly different ways. Mohammad Qadeer (1997) delves into some of the empirical realities of multiculturalism as it plays out in Canadian cities, lending a detailed look into the daily practice of urban diversity in one country. Of equal importance, however, attitudes differ vastly within countries. Different US municipalities understand their relationship to “the stranger” variously.

The planning profession—both academics and practitioners—has made clear, at least in aspiration, the importance of a diversity of voices in forging the contemporary city. Because a positive attitude towards interculturalism is such a foundational building block of any pluralistic planning process, in my evaluation of ten Atlanta-area plans, I identify the recognition and embrace of diversity—particularly regarding immigrant communities—as a key feature of planning analysis that meets the needs of local undocumented immigrants. Further, I also identify a demonstrated understanding of diversity as a key feature of planning engagement.

PAR2. Recognition of immigration status in the planning analysis, as well as recognition of such in the engagement process

As noted earlier, immigrant documentation status is a little-acknowledged demographic attribute among planners—or at least among planning academicians. There is scant to say on this matter except that one would expect a clear link between recognition of the existence of undocumented individuals within the community, and planning decisions that begin to address their needs. Thus I have included, as a criterion in my analysis, whether or not the plan recognizes the presence of undocumented people and their legal status.

PAR3. Discussion of potential for a day labor center or other facility/resource specifically targeting undocumented community members

One of the most significant ways that plans turn ideas into built-environment reality is by suggesting facilities and amenities that a community might consider adding. Some of such specifically benefit undocumented immigrants. The most prominent and obvious of these is a day labor center. These centers are institutionalized nexuses within a community that allow the safe and organized connection of “day laborers”, informal manual laborers who are often undocumented, to people looking to hire these workers. This institutional incorporation of an informal economy existing in a legal gray zone represents an aspect of the “Don’t Ask Don’t Tell” orientation towards undocumented immigrants mentioned earlier. Day labor centers operate within a larger context of “worker centers”, activist labor organizations that endeavor to preserve and uphold worker rights for laborers including the undocumented. Day labor centers serve a key protective role because methods of finding this kind of work which are even more informal, such as seeking jobs literally on the street or joining a day labor agency, frequently open up workers, particularly undocumented workers, to wage theft and other forms of abuse (Smith, 2008). Indeed, the partial formality granted by day labor centers can help undocumented workers avoid other industries that are notorious for being exploitative; in one 2009 report, the Southern Poverty Law Center reported that 41% of Latino workers in the South (many of whom undocumented) claimed that they had been the victim of wage theft.

Other resources in addition to day labor centers may also be within the purview of planners to recommend for a community. What’s clear is that if planners can recommend educational facilities, transportation improvements, community centers, and other local built-environment amenities, social infrastructure serving the undocumented can also constitute part of a plan’s recommendations, even if planners have infrequently availed themselves of this choice. Economic development is a relatively undisputed component of the planning profession’s mandate within communities. Thus, I have included discussion of day labor centers and other such potential facilities as a criterion within my analysis.

PAR4. Discussion of job development and/or training for low-skill workers

Overwhelmingly, the primary motivation for unauthorized immigrants making the dangerous journey to the United States is economic. Consequently, perhaps the chief need for undocumented immigrants in the United States is for appropriate jobs that they can work. A number of barriers exist, for the undocumented, in finding employment. Foremost, any formal-sector job will at least ostensibly require demonstration of right to work in the US, which unauthorized immigrants obviously lack.

Undocumented immigrants thus have two solutions for finding employment. The first is to work an informal job that does not request proof of identification. Many individuals do choose these jobs, particularly because they often happen to be unskilled positions as well.

One analysis (Fiscal Policy Institute, 2007) estimates that over half of all dishwashers in New York City are undocumented, in addition to a third of all food preparation workers and construction laborers, among other occupations. In many rural areas, undocumented immigrants constitute an overwhelming majority of temporary agricultural workers; as of the early 2000s, according to the National Agricultural Workers Survey, 52 percent of farmworkers were undocumented immigrants (Thompson and Wiggins, 2002). The ubiquity of undocumented workers in crop work was brought most recently to the nation's attention when exclusionary laws in states like Alabama (Guarino, 2011) and Georgia (Dixon, 2011) led to severe and costly labor shortages in those state's agricultural economies as workers fled the state.

The second means of employment for unauthorized immigrants is to assume a false social security number under which to work. For a long time, due to lack of coordination between government agencies, working with false identification or an incorrect social security number has not been uncommon (Leland, 2006). This has become perhaps more difficult since the emergence, in the latter half of the 2000s, of E-Verify, a mostly-voluntary service through which employers can check for discrepancies between a worker's identity and his or her supposed social security number. However, only one in five new workers undergoes this screening, and serious doubts have been raised about its basic efficacy (Rosenblum, 2011). While some legitimate concerns have been raised about cases in which undocumented workers knowingly or unknowingly work under an actual living citizen's social security number, by and large unauthorized employees who work under an assumed number are paying into a system from which they will never reap the benefits: between 1996 and 2003, the US government received \$50 billion in Social Security and Medicare taxes from mismatched W2 forms, considered to mostly be those from undocumented workers. One press officer with the Social Security Administration bluntly stated, "Overall, any type of immigration is a net positive to Social Security. The more people working and paying into the system, the better." (Kasperkevic, 2012)

In addition to documentation status itself, undocumented jobseekers face additional barriers to employment. Unauthorized immigrants have, on average, lower educational attainment than either legal immigrants or native-born citizens (Amuedo-Dorantes and Sparber, 2012). Given that even well-educated legal immigrants frequently find themselves having to take jobs far below their educational attainment, the types of work available to uneducated, undocumented immigrants is somewhat limited. Another barrier is English language ability. Data from the 2000 Census showed that almost half of the foreign-born workforce is "limited English proficient" (Capps et al., 2003); it can be assumed that for the undocumented population this figure is yet significantly higher, which, coupled with low educational attainment, would further limit employment options (Loh and Richardson, 2004).

The employment struggle for unauthorized immigrants does not end with the search for a job; abuse and exploitation of undocumented workers are endemic. A 2009 survey conducted by the Southern Poverty Law Center of mostly-undocumented Latino laborers in the Southeast US found that 41% of respondents had experienced wage theft; 80% "had no idea how to contact government enforcement

agencies such as the Department of Labor” or “did not know such agencies even exist”; and 32% reported on-the-job injuries. In her work interviewing undocumented laborers, Shannon Gleeson (2010) explored the effect documentation status has on a worker’s feeling of agency to initiate a claim against an employer, and found that significant fears of deportation or other legal repercussions largely prevented unauthorized workers from doing so.

Given this context, and the fact that undocumented immigrants are primarily restricted to unskilled work, I have identified as a criterion for evaluation whether the planning document discusses the cultivation of a diversity of high-quality jobs.

PAR5. Recognition of need for affordable housing

Many of the needs of undocumented immigrant communities—such as skill-appropriate jobs, above—are not significantly different from those of other marginalized, poor populations. Affordable housing is one of these. Widespread stigmatization of the undocumented, however, as well as potential lifestyle characteristics accompanying lack of documentation status, often leave unauthorized immigrants’ housing situations unique in certain ways.

A study by historian Mary Odem (2008), looking specifically at the contestation of undocumented Latino social membership in the Atlanta region, sheds some light on the issue. Writing on the housing issue, Odem describes how, during the economic downturn of the 1970s and 80s, Latino immigrants were eagerly welcomed into the empty apartments of landlords in Doraville and Chamblee (each home to a planning document to be analyzed later in this report). Many, including the undocumented, were able not only to rent apartments but to purchase houses as well. According to Odem, immigrants had a reputation as “good credit risks” and as having “low default rates on loans”; local banks were thus more than happy to accommodate Latino immigrant customers regardless of documentation status, and eased their processes in several ways, “allowing customers to cash cheques, open a bank account, apply for a mortgage and borrow money without proof of legal residency.”

However, while the region’s financial infrastructure welcomed these immigrants to whose legal status it generally turned a blind eye, native-born residents grew increasingly tense. The typical living arrangement of area Latino homes—“larger households with extended family members and borders”—was targeted by aggressive, ethnically-focused enforcement of existing housing codes, as well as pointed redefinition of such in jurisdictions including the City of Roswell and Cobb County. Odem’s account of this contestation of space regulations ends inconclusively; the conflict is still ongoing. From her brief yet detailed description of this sequence of events, we can see how the housing preferences of undocumented immigrants serves as a lightning rod to mark them as different within the community, and thus contributes to defining their identity in the receiving country.

Research supports the idea that housing density is, broadly speaking, a characteristic of the United States' undocumented population. Standish et al.'s 2010 study of undocumented Mexican immigrants in New York City, for example, found that population to generally live in "conditions of marked household density," with the trend becoming even more noticeable in cases of linguistic marginalization or food insecurity. The study concluded that "undocumented Mexicans live in much denser conditions than other U.S. residents." While studies explicitly looking at household density of undocumented immigrants appears to focus solely on Latinos, the attested correlation between poverty and housing density (see Federman et al., 1996; Evans et al., 2001) viewed in light of undocumented immigrants' high likelihood to be poor implies that undocumented immigrants are, in general, likely to live in denser households.

Because housing density tends to be characteristic of undocumented immigrant settlement patterns, and because so many undocumented immigrants make minimum wage or lower, in order to address the needs of this population, plans need to consider ensuring that a community contains ample dense, affordable housing units. This is included as a criterion in my evaluation of the plans.

PAR6. Recognition of community policing and other progressive criminal justice initiatives

Fear of state repercussion can prevent undocumented immigrants from taking advantage of a wide range of resources, including health care (Bauer et al., 2000; Berk and Schur, 2001; Okie, 2007) and legal claims-making (Bloomekatz, 2007; Gleeson, 2010; Abrego, 2011). While these barriers are extremely detrimental to the undocumented immigrant population, perhaps that with the greatest community-wide effect is the barrier often preventing unauthorized immigrants from interacting with the police. While the federal government technically has sole purview over immigration, a landscape of continually shifting relationships between local law enforcement and federal authorities has left many undocumented people wary of interacting with the police.

Since the attacks of September 11, 2001, state and local police departments have come under increasing pressure to participate in the arrest of undocumented immigrants. Wishnie (2004), writing a few years after 9/11, describes the increasing insistence with which Alberto Gonzales' Department of Justice encouraged the coordination of federal, state, and local efforts on immigration enforcement. Section 287(g) of the 1996 Immigration and Nationality Act enables state and local law enforcement agencies to sign a Memorandum of Understanding with the federal government and receive training from Immigration and Customs Enforcement (ICE). In the mid-2000s, however, in the climate of an increasingly politicized immigration debate, the 287(g) program took on new vigor as law enforcement agencies—overwhelmingly in the South and with higher-than-average Latino populations (ACLU of Georgia, 2009)—opted in to these Memoranda. It was within this context that in 2010 the state of Arizona passed SB1070, which requires state and local law enforcement agents to incorporate immigration enforcement into their essential duties. The following year, at least 24 state legislatures across the

country considered adopting a copycat law (Lacayo, 2011). Ultimately, similar laws passed in Alabama, Georgia, Indiana, South Carolina and Utah.

Where individuals are afraid to expose their own legal status to scrutiny and thus potential deportation, serious problems arise for community security. Crime retreats behind closed doors, and victims suffer in silence. Lines of communication between undocumented immigrant communities and law enforcement are essentially cut off. Fears around deportation also disproportionately affect individuals who are doubly vulnerable; for example, undocumented women who are suffering domestic abuse are often fearful of reporting it and thus opening their and their families' documentation status up to the scrutiny of law enforcement (Kasturirangan, Krishnan, and Riger, 2004). "Community policing" is a paradigm within criminal justice that emphasizes collaborative links between law enforcement officials and communities, including undocumented immigrants communities. While the term can be used euphemistically to describe policies that are, in fact, ultimately immigrant-hostile, community policing can have major benefits when applied correctly. For example, Torres and Vogel (2001) found that fear of crime diminished noticeably within Latino and Vietnamese immigrant populations after a community policing policy was put into place in one California community.

In the contemporary world, planners are increasingly called upon to take part in problem-solving around crime and law enforcement. Thus, planners do have a role in encouraging just and community-based approaches to criminal justice. I have included community policing as one criterion in my analysis of the planning documents.

PAR7. Support of small business entrepreneurship

Immigrants in general, including undocumented immigrants, are more likely to work for small or "mom and pop" businesses (for example, see Lillie-Blanton and Hudman, 2001). Lower likelihood of documentation enforcement makes these businesses more realistic employment options for those who cannot present legal papers. Social networks also lead to undocumented immigrants working more frequently for businesses run by individuals from similar ethnic backgrounds (for example, see Villar, 1992; Zhou, 2006; Zhou, Tseng, and Kim, 2008); this fits within a wider literature on "ethnic enclaves".

Encouraging small business and entrepreneurship has been a key component of planners' toolboxes in generally encouraging the vibrancy and economic sustainability of low-income and minority neighborhoods. Because it has strong additional implications specifically for the undocumented, I have identified it as a criterion in my plan analysis.

EP1 and EP2. Discussion of outreach to immigrant communities and discussion of outreach to undocumented immigrant communities specifically

As mentioned, there are a number of reasons that reaching out to undocumented immigrants within a community is both difficult and important. Where there are not progressive measures in place such as community policing and other efforts that show good faith toward undocumented immigrants on the part of institutional actors, undocumented people may fear taking part in processes that force them into the public sphere (for example, see Bernstein, 2012). While specifically making connections that encourage undocumented immigrants to take part in the planning process would be, obviously, the most effective tool in bringing these individuals' voices to the table, reaching out to local immigrant communities in general would help towards making sure the interests of the undocumented are at least partially represented. Thus, as one of my criteria for plan analysis I have examined whether or not the engagement component of the plan discussed a) outreach to immigrant communities and b) outreach to *undocumented* immigrant communities.

EP3. Awareness of location issues in the engagement process

A good engagement plan should be well thought out, rather than ad hoc. Different variables present in the engagement process can have powerful effects on the type and quality of resident input obtained. One of these variables is the location of public meetings. Planners should be attuned to the implications of different sorts of space; as mentioned, undocumented immigrants often have reason to fear institutional entities. Thus, holding a meeting in a space tied to these actors may have a deterrent effect on participation by undocumented individuals. For example, Kondo (2013) recounts a planning process in which county officials decided to hold two out of four planning meetings at a police station, in ignorance of local fears towards law enforcements. A community-based or neutral space may be more effective in helping undocumented immigrants to feel comfortable participating in the planning process. Thus, as a criterion for my evaluation of plans I examined whether the engagement discussion explicitly recognized meeting siting as an important issue to consider.

EP4. Awareness of language issues in the engagement process

As has been discussed earlier, English language proficiency can be a major barrier to undocumented immigrant participation in a number of spheres of American life. Research shows that two-thirds of low-wage immigrant workers in the US, many of whom are undocumented, do not speak English proficiently (Capps *et al.*, 2003). There is now a robust literature on language access issues within the health literacy field, but an understanding of these issues does not seem to have sufficiently penetrated the planning community. It is not only undocumented immigrants that have low English proficiency, but a substantial number of immigrants with legal status as well; thus,

ensuring that local residents can access the planning process in their own language benefits immigrant communities in general, regardless of status. Because language can present such a basic barrier to social and political entry for participants in the planning process, I have included as a criterion in my analysis of plans whether or not the engagement process discussed provision of non-English services.

BACKGROUND OF PLANS SELECTED FOR EVALUATION

The ***Chamblee Comprehensive Plan*** is a ten-year update plan conducted in 2005, with a study area of Fulton County's City of Chamblee, northeast of Atlanta. It was conducted jointly by engineering firm PBS&J (now part of Atkins) and Atlanta-based planning firm Ross and Associates. As this plan was carried out under the auspices of the Georgia Department of Community Affairs' mandated local planning requirements, it consists of three primary sections: a Community Assessment, documenting the state of the jurisdiction's context and assets; a Community Participation Program, outlining the public outreach and participation process to be used in shaping the recommendation process; and a Community Agenda, setting recommendations and priorities for the community's future. The Chamblee plan further adds to its Community Assessment a section it calls a Technical Assessment Analysis, focusing on technical data.

The ***Jimmy Carter Boulevard Corridor Study*** is a 2007 plan conducted as part of the Livable Centers Initiative (LCI) program, with a study area of a 2.4-mile long portion of Jimmy Carter Boulevard, located mostly in unincorporated Gwinnett County, to the northeast of Atlanta. The study was conducted jointly by PBS&J and Atlanta-based real estate consultants Bleakly Advisory Group.

The ***Norcross Activity Center LCI Plan*** is a 2008 LCI-funded study focusing on an area mostly in unincorporated Gwinnett County and partially in the City of Norcross, to the northeast of Atlanta. The process was headed by Atlanta-based planning firm Urban Collage, assisted by JJG (now part of Jacobs Engineering) and Atlanta-based real estate consultants Bleakly Advisory Group.

The ***Doraville Comprehensive Plan*** is a 2006 plan update mandated by the Georgia Department of Community Affairs. Its area of study is the City of Doraville, in north Fulton County, to the northeast of Atlanta. The plan was conducted by Atlanta-based engineering/planning/architecture firm Robert and Company, and takes the three-part form prescribed by the Georgia DCA (as described above).

The ***Indian Trail-Lilburn Road LCI Corridor Study*** is a plan conducted in 2007 as part of the ARC's LCI program. The area of study is a 3.6-mile corridor along Indian Trail Lilburn Road, going through the City of Norcross, unincorporated Gwinnett County, and the City of Lilburn, all to the northeast of Atlanta. It was conducted by engineering firm URS Corporation, in association with Atlanta-based planning

form Urban Collage, Atlanta-based real estate consultants Bleakly Advisory Group, and Georgia-based transportation planning firm MPH and Associates.

The ***Highway 29 Boulevard of Opportunity Corridor Study*** is a 2011 plan conducted as part of the Livable Centers Initiative. Its area of study is a four-mile stretch of US-29 to the northeast of Atlanta, primarily in the City of Lilburn and partially in unincorporated Gwinnett County. The plan was conducted jointly by Atlanta-based architecture/engineering/planning firm Pond and Company, Atlanta-based planning firm Market and Main, design consultants Stantec, and Atlanta-based firm Collaborative Infrastructure Services.

The ***Roswell Historic Gateway Master Plan*** is a 2012 study technically unaffiliated with either the LCI program or with the Georgia Department of Community Affairs' mandated planning requirements, but considers itself a supplement to the 2008 Roswell Town Center / Atlanta Street Corridor LCI Plan. Its area of study is within the City of Roswell, to the north of Atlanta in Fulton County, and occupies a portion of the focus area of the prior LCI study. The plan was conducted by architecture and planning firm Duany Plater-Zyberk and Company.

The ***Gwinnett Place Mall Pilot Study*** is a 2004 plan conducted as part of the ARC's Livable Centers Initiative. The area of study is located in unincorporated Gwinnett County, to the northeast of Atlanta, and occupies over two thousand acres centered around the Gwinnett Place Mall. The plan was conducted by architecture/engineering/planning firm HOK, real estate firm Robert Charles Lesser and Co., engineering firm URS Corporation, and energy consultants USInfrastructure.

The ***North Point Activity Center LCI Study*** is a 2008 study conducted as part of the Livable Centers Initiative. Its area of focus is a southwestern portion of the City of Alpharetta, in Fulton County to the north of Atlanta. The study was conducted by Atlanta-based planning firm Urban Collage, in association with engineering firm URS Corporation and real estate firm Robert Charles Lesser and Co.

The ***Lilburn Comprehensive Plan*** is a 2009 study conducted under the auspices of the Georgia Department of Community Affairs' planning requirements. Its area of study is the totality of the City of Lilburn, in Gwinnett County to the northeast of Atlanta. The plan was conducted by design firm Clark Patterson Lee and follows the three-part structure prescribed by the DCA. The Community Assessment portion, however, was fulfilled jointly with Gwinnett County as part of the county's 2007 report by engineering firm Parsons Brinckerhoff, architecture and engineering firm HNTB, and real estate consultants Bay Area Economics.

RESULTS

Figure 3. Evaluation of ten plans.

● = Plan addresses criterion.

○ = Plan does not address criterion or, conversely, deals with it in a negative manner.

	PAR1. Recognition of immigrant communities	PAR2. Recognition of documentation status	PAR3. Facilities serving undocumented populations	PAR4. Appropriate job development and training	PAR5. Affordable housing	PAR6. Community policing	PAR7. Small business and entrepreneurship support	EP1. Discussion of outreach to immigrants	EP2. Discussion of undocumented in outreach process	EP3. Awareness of location issues	EP4. Awareness of language issues
Chamblee Comprehensive Plan	●	○	○	●	●	●	●	●	○	○	○
Jimmy Carter Boulevard LCI	●	○	○	○	●	○	○	○	○	○	○
Doraville Comprehensive Plan	●	○	○	●	●	○	●	○	○	○	○
Norcross LCI	○	○	○	○	●	○	○	○	○	○	○
Indian Trail LCI	○	○	○	○	○	○	○	○	○	○	○
Highway 29 LCI	●	○	○	●	●	○	○	○	○	○	○
Lilburn Comprehensive Plan	●	○	○	●	●	○	○	○	○	○	○
Roswell Historic Gateway Master Plan	○	○	○	○	○	○	○	○	○	○	○
Gwinnett Place Mall Pilot Study	●	○	○	○	○	○	○	○	○	○	○
North Point Alpharetta LCI	○	○	○	○	●	○	○	○	○	○	○

DISCUSSION OF RESULTS BY CRITERION

PAR1. Recognition of immigrants and community diversity

In terms of the plans themselves, six out of the ten plans—60%—positively addressed diversity or the presence of local immigrant communities. Chamblee’s comprehensive plan, in particular, notes the crucial presence of ethnic diversity as a community benefit: “Chamblee’s population is ethnically and culturally diverse. This diversity is considered one of the City’s most important assets.” This is mentioned in a number of sections of the plan. The Jimmy Carter Boulevard LCI plan also points out the racial diversity of the area in its demographic analysis. However, it doesn’t necessarily consider this characteristic to be an asset; it identifies ethnic diversity as a “challenge” alongside problems like vacancy and poor infrastructure. The Doraville Comprehensive Plan, the Highway 29 LCI Plan, the Lilburn Comprehensive Plan, and the Gwinnett Place Mall Pilot Study all also recognize the diverse character of their communities. Nonetheless, it is worth noting that diversity is generally recognized in broad strokes rather than discussing the presence of specific groups, such as immigrants.

PAR2. Recognition of immigration status in the planning analysis, as well as recognition of such in the engagement process

No plan evaluated mentioned documentation status in any way, either in the context of the plan and recommendations or of the outreach status.

PAR3. Discussion of potential for a day labor center or other facility/resource specifically targeting undocumented community members

No plan evaluated discussed, either positively or negatively, the potential for siting a day labor center or some other facility or resource specifically serving undocumented immigrants.

PAR4. Discussion of job development and/or training for low-skill workers

Four out of the ten plans evaluated—40%—discussed appropriate workforce development that might have a positive effect on local undocumented workers. For example, the Lilburn Comprehensive Plan identifies as “Quality Community Objectives” that both skilled and unskilled work opportunities should be available. The Chamblee and Doraville Comprehensive Plans, as well as the Highway 29 LCI Plan, also identify the need for appropriate and diverse job development.

PAR5. Recognition of need for affordable housing

This criterion was the one most frequently fulfilled in the studies evaluated. Seven out of the ten plans evaluated—70%—discussed and/or recommended affordable housing or a diversity of housing choices within the area of study. Only two plans, the Indian Trail LCI Study and the Roswell Historic Gateway Master Plan, did not discuss this variable at all. The Gwinnett Place Mall Pilot Study mentioned affordable housing primarily in a negative light, stating, for example, that the “high concentration of renters creates transiency, crime and other issues that impact schools and the quality of adjacent development.” This antipathy towards renters is, in practice, hostile not only to undocumented immigrants but also other typically low-income populations.

PAR6. Recognition of community policing and other progressive criminal justice initiatives

One plan evaluated—10%—discussed community policing as part of its overall service provision. This is the Chamblee Comprehensive Plan, which states that the city is “[c]ommitted to the philosophy of community policing”.

PAR7. Support of small business entrepreneurship

Two plans evaluated—20%—expressed support for small business entrepreneurship that might increase the employment base for immigrants including undocumented immigrants. Chamblee’s comprehensive plan affirms that a “major aspect of the City’s economic development potential and draw is its reliance on and appreciation of small businesses.” Doraville’s, similarly, declares it a policy moving forward to “[e]ncourage small scale commercial spaces to promote the strength of locally owned and operated businesses that cater to the local community.”

EP1 and EP2. Specific outreach to immigrants in general and/or undocumented immigrants in the engagement process

Only one plan, however—10%—documented efforts to involve immigrant communities in the participation process. The engagement portion of Chamblee’s comprehensive plan identifies immigrants as a “special interest”, stating that “Chamblee is a diverse and cultur[ally] rich community with several major land uses that require special attention [...] Special interests subcategories that were identified [...] The Hispanic Community, The Asian Community[.]” Later, the Community Agenda confirms that the public process involved “representatives of the ethnic community.” No further detail is given. Nonetheless, this was the only instance of any of the four engagement-related criteria being fulfilled throughout all ten plans.

EP3. Awareness of location issues in the engagement process

No plan evaluated demonstrated an awareness of the potential for meeting location to dissuade undocumented immigrants from participating in the engagement process.

EP4. Awareness of language issues in the engagement process

No plan evaluated demonstrated an awareness of language challenges in the engagement process, nor did any plan evaluated describe any multilingual outreach efforts.

In general

Overwhelmingly, the needs of undocumented immigrants in the planning process, as identified, were not met. Those that were most frequently met were those variables that are increasingly becoming general best practices within the planning field, such as recognition of diversity and preservation of affordable housing, rather than an explicit tip of the hat to the undocumented community. While active and visible engagement of undocumented immigrants is still politically contentious in today's climate, it seems quite remarkable that the plans examined, with such high proportions of foreign-born residents within their study areas, did not address to a greater extent the needs even of more established and authorized immigrant stakeholders.

Looking at Figure 2, wherein the plans are ordered from top to bottom by foreign-born population percentage within study area, one can see a general, though imperfect, correlation between immigrant population and identified criterion fulfillment. While there clearly remains a dire lack of addressing undocumented immigrants' needs even in communities where they make up a large percentage of the resident base, it is worth noting that their influence does appear to increase to some degree with their population share.

SECTION 4. RECOMMENDATIONS

A few key recommendations for planning practice are suggested by these findings.

On the broadest and perhaps most obvious level, **planners need to recognize undocumented immigrants as community stakeholders within the planning process, and anticipate and serve their needs.** This gap in planning practice has been exacerbated by the diversity of roles and skills within the planning field, which is accompanied by a certain confusion around what planners do and are

authorized to do. As Domenic Vitiello (2009) outlines, “while countries in Europe and the British Commonwealth have established traditions of social planning, including national immigrant integration programs, in the United States most community development in migrant communities is done by social workers[,] not planners.” As the US planning field excitingly renews historic yet under-appreciated links to professional traditions such as public health (Botchwey *et al.*, 2009; Botchwey and Trowbridge, 2011), it needs to invest, as well, in understanding the role of planners within communities’ social infrastructure, and our relationship to professions such as social work and community organizing. One of the most distressing opportunity gaps in current engagement practice, at least in those plans analyzed here, is the lack of attention to language issues. As the United States—a nation with, notably, no official language—becomes rapidly more multilingual, sole reliance on English becomes less and less excusable.

Additionally, **plans need to embody greater transparency in describing their public engagement processes.** While almost all plans have a brief section describing outreach and engagement, and Georgia’s Department of Community Affairs (in these cases, focusing on Atlanta-area plans) requires reporting on such, these discussions are almost universally very rudimentary. From examining the plans, it is impossible to say whether the engagement processes themselves were actually only cursory, or whether there was indeed an intensive and thorough process that was simply ill-documented. Especially considering the public monies feeding these planning processes, the planners involved owe the public an extensive description of how engagement was conducted. Additionally, while race and other demographic variables through which inequities are perpetuated have been well-discussed in academic planning literature, in practice these are often under-recognized by “on the ground” planners (for example, see Washington and Strong, 1997; Fennelly, 2004). Planners need to overcome the perception that explicit consideration of race, immigration status, and other demographic features is impolite or impolitic, and approach these variables expressly as an important part of community planning. For example, it would be unlikely to see an engagement plan that describes the gender breakdown of public meeting attendees; yet if every single attendee was male, this would be a significant bias in the process that would nonetheless go completely un-noted.

Finally, **the planning profession needs to increase its internal diversity in order to confront the challenges of today and tomorrow.** The planning profession has recognized a deleterious lack of diversity along racial and gender (Ross, 1990) as well as linguistic (Stiftel and Mukhopadhyay, 2007) lines. For example, though they make up an increasingly large percentage of the American public, as well as a plurality of recent immigrants to the US, Latinos are under-represented in the planning field; a 2001 analysis of New York Metro American Planning Association chapter found that only 6% of members were Latino/a, comprising a 15.7% “representation gap” when compared to the area’s general population. While it is important not to over-simplify in assuming that members of a given group are better-equipped to serve that group as planners—this thought harkening back, perhaps, to the precepts of advocacy planning—yet there are some very clear benefits to diversity among planners, not least of which ensuring that a diverse spectrum of Americans have access to the professional sector. Planners growing up in a Spanish- or, say, Mandarin-speaking household would be

more likely to possess those language skills—a crucial benefit, given the language access problems identified above. Further, a more diverse planning field would reduce historic tensions between communities and planners, and increase the sense that planners are *of* the community rather than foreign to it. For example, a Latino community might be more likely to engage actively in a planning process if they see that the staff includes Latino/a planners.

CONCLUSION

This paper has opened up the question of how planners do and should position themselves in the context of undocumented communities. The most obvious next step for further research is to conduct a significant number of interviews with both planners and undocumented individuals, to assess what this relationship looks like from both ends. Looking at planning documents uncovers important information, especially because this is the same information that the general public has access to, but direct qualitative investigations with actual stakeholders will reveal much of what lies behind the surface.

Despite the fact that undocumented immigrants represent a significant population within the United States, they are under-recognized within both planning academia and practice. Academics primarily discuss immigrants outside of the context of their legal status, and occasionally write on status specifically, yet do not offer recommendations on the practice level. Practitioners, in their planning documents, sometimes offer vague recommendations that intersect with undocumented communities' needs, but mostly fall very short in this realm. Planners are clearly mandated, both by professional codes and by dominant thought in the planning literature, to actively incorporate the voices of under-served communities—including undocumented immigrants—into the planning process. As we have seen, there is still much work left to do.

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APPENDIX: ALL PLANS INITIALLY CONSIDERED FOR EVALUATION INCLUSION

PLAN	% of population foreign born within study area
Chamblee Comprehensive Plan	57.3%
Doraville LCI	54.7%
Jimmy Carter Blvd LCI	53.0%
Norcross Activity Center LCI	52.5%
Doraville GM LCI	49.1%
Doraville Comprehensive Plan	46.9%
Norcross Comprehensive Plan	46.8%
Indian Trail Lilburn LCI	45.9%
Highway 29/Lilburn LC	44.3%
Lilburn LCI	43.9%
Clarkston Comprehensive Plan	40.2%
Roswell Historic Gateway Master Plan	36.3%
Gwinnett Place Mall Pilot Study	33.8%
North Point Alpharetta LCI	32.9%
Hapeville Town Center LCI	32.8%
Hapeville VA Park LCI	32.8%
Duluth Comprehensive Plan	31.3%
Lilburn Comprehensive Plan	31.0%
Duluth LCI	29.5%
Berkeley Lake Comprehensive Plan	29.2%
Forest Park LCI	28.6%
Berkeley Park Blueprint	28.5%
Loring Heights Master Plan	28.5%

Roswell LCI	28.4%
Lawrenceville LCI	28.3%
Moore's Mill Rd LCI	27.7%
Lawrenceville Comprehensive Plan	27.4%
Gwinnett County Comprehensive Plan	26.3%
Buford LCI	25.9%
Johns Creek Comprehensive Plan	25.3%
Sandy Springs Roswell Road LCI	24.9%
Norcross Town Center LCI	24.8%
Marietta LCI	24.5%
Roswell/Atlanta Street LCI	24.3%
Marietta Comprehensive Plan	23.7%
Smyrna LCI	23.3%
Home Park Blueprint	22.7%
Home Park Master Plan	22.7%
Dunwoody Comprehensive Plan	22.6%
Suwanee Comprehensive Plan	22.2%
Cumberland LCI	22.1%
Sandy Springs Comprehensive Plan	21.9%
Alpharetta LCI	21.8%
Alpharetta Comprehensive Plan	21.8%
Emory Village LCI	21.6%
Perimeter Center LCI	21.2%
Buford Comprehensive Plan	21.1%
Austell Rd LCI	20.7%
Roswell Comprehensive Plan	20.3%
Georgetown/N. Shallowford LCI	20.1%

Morrow LCI	19.9%
Cumming Comprehensive Plan	19.4%
Sandy Springs Town Center LCI	19.4%
Lindbergh-Lavista Blueprint	19.2%
North Druid Hills LCI	19.1%
Acworth LCI	18.4%
Acworth Community Agenda	18.4%
Stockbridge LCI	18.2%
Canton Comprehensive Plan	18.2%
McFarland-Stoney Point LCI	18.1%
Town Center LCI	18.0%
Morrow Comprehensive Plan	17.7%
Smyrna Comprehensive Plan	17.3%
Canton LCI	17.2%
Milton Community Agenda	17.0%
Dunwoody Village LCI	16.9%
Brookhaven LCI	16.7%
DeKalb County Comprehensive Plan	16.7%
Austell LCI	16.2%
Stone Mountain LCI	16.2%
Plan 2040	16.0%
Sugar Hill Comprehensive Plan	15.9%
Lithonia LCI	15.6%
Lithonia Blueprint	15.6%
Lithonia Comprehensive Plan	15.6%
Jonesboro LCI	15.3%
Kennesaw LCI	15.3%
Chosewood Park Redevelopment Plan	15.3%
Delk Rd LCI	15.2%
Austell Community Agenda	15.2%

Cobb County Comprehensive Plan	15.0%
Upper Westside LCI	14.9%
Hwy 78 LCI	14.7%
Kennesaw Comprehensive Plan	14.7%
Northlake LCI	14.4%
South Moreland LCI	14.4%
Clayton County Comprehensive Plan	14.4%
Buckhead LCI	14.3%
Snellville Comprehensive Plan	14.2%
Conyers LCI	13.8%
Dacula Comprehensive Plan	13.7%
Park Place LCI	13.7%
Northwest Clayton LCI	13.6%
Forsyth County Comprehensive Plan	13.6%
Woodstock Comprehensive Plan	13.5%
Fulton County Plan 2030	13.2%
Butler-Auburn Redevelopment Plan	13.0%
Riverdale LCI	12.9%
Lavista Blueprint	12.9%
Tucker LCI	12.8%
Cheshire Bridge Rd Study	12.8%
Grayson Comprehensive Plan	12.7%
Tyrone Comprehensive Plan	12.7%
Snellville LCI	12.5%
Riverdale Comprehensive Plan	12.2%
Loganville LCI	12.1%
College Park Comprehensive Plan	12.1%
DL Hollowell Vets LCI	12.0%
Piedmont Heights Blueprint	11.8%
McDonough LCI	11.7%

Conyers/Rockdale Blueprint	11.7%
Stone Mountain Comprehensive Plan	11.5%
JSA McGill LCI	10.7%
Powder Springs Comprehensive Plan	10.6%
Woodstock LCI	10.3%
East Point LCI	10.1%
Winder LCI	10.1%
Poncey-Highland Master Plan	9.9%
Bells Ferry Rd LCI	9.8%
Powder Springs LCI	9.8%
Hwy 278 LCI	9.7%
Old National LCI	9.7%
Fayetteville LCI	9.6%
Fayetteville Comprehensive Plan	9.6%
Douglas County Comprehensive Plan	9.5%
Fayette County Comprehensive Plan	9.0%
Newnan Comprehensive Plan	9.0%
Decatur Comprehensive Plan	8.8%
East Point Comprehensive Plan	8.8%
Fairburn Comprehensive Plan	8.8%
Cherokee County Comprehensive Plan	8.6%
Fairburn LCI	8.5%
Ponce/Moreland LCI	8.5%
Collier Village Blueprint	8.5%
Castleberry Hill Master Plan	8.5%
Mechanicsville Redevelopment Plan	8.3%
City of Atlanta CDP	7.8%
Kensington LCI	7.7%
Hudson Bridge LCI	7.6%
Hwy 92 LCI	7.6%

Holly Springs LCI	7.5%
Vine City LCI	7.5%
Vine City Redevelopment Plan	7.5%
Holly Springs Comprehensive Plan	7.5%
Greenbriar LCI	7.4%
Barrow County Community Agenda	7.4%
Henry County Comprehensive Plan	7.4%
Braselton Comprehensive Plan	7.3%
Old Fourth Ward Master Plan	7.2%
Avondale MARTA LCI	7.2%
Dallas LCI	6.9%
Moreland Comprehensive Plan	6.5%
Newton Blueprint	6.4%
Coweta County Comprehensive Plan	5.6%
Hampton LCI	5.6%
West Griffin LCI	5.4%
Covington Blueprint	5.4%
Villa Rica Comprehensive Plan	5.2%
Westside Blueprint	5.1%
NPU-Z Comprehensive Plan	5.1%
Oxford Comprehensive Plan	5.1%
West Lake LCI	4.7%
Jonesboro Highway Corridor Plan	4.5%
Sharpsburg Comprehensive Plan	4.5%
Turin Comprehensive Plan	4.5%
HE Holmes LCI	4.4%
West End LCI	4.4%
Edgewood-Candler Park Charrette	4.4%
Palmetto LCI	4.3%
Senoia Blueprint	4.3%

Cleveland Ave Study	4.3%
Palmetto Comprehensive Plan	4.3%
Paulding County Comprehensive Plan	4.2%
Edgewood Redevelopment Plan	4.1%
NPU-X Comprehensive Plan	4.1%
Lakewood Heights Blueprint	4.0%
Oakland City Lakewood LCI	3.9%
Walton County Comprehensive Plan	3.9%
Douglasville LCI	3.8%
Westview Plan	3.8%
Simpson Road Redevelopment Plan	3.4%
Senoia Comprehensive Plan	3.4%
Griffin Comprehensive Plan	3.3%
Sandtown LCI	3.0%
East Atlanta Village Study	2.9%
Campbellton-Cascade Corridors Redevt. Plan	2.8%

Union City LCI	2.5%
Renynoldstown Master Plan	2.4%
Avondale Estates Community Agenda	2.4%
Griffin LCI	2.3%
Candler Rd LCI	2.1%
Avondale Estates LCI	1.7%
English Avenue Redevelopment Plan	1.6%
NPU-S Comprehensive Plan	1.5%
NPU-G Blueprint	1.2%
Grantville Comprehensive Plan	1.0%
D.L. Hollowell Redevelopment Plan	0.9%
Pittsburgh Blueprint	0.6%
Pittsburgh Community Redevelopment Plan	0.6%
Preservation of Pittsburgh	0.6%
Bankhead MARTA LCI	0.4%
Tri-County LCI	0.2%